



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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August 2, 2024

Via ECF

Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007

Re: *Harris v. New York City Human Resources Admin., et al.*,
No. 20 Civ. 2011 (JPC) (SN)
LM No. 2020-021184

Dear Judge Cronan:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, assigned to represent the remaining Defendant in the above-referenced matter. I write to respectfully request a 14-day extension of time, from August 5, 2024 to August 19, 2024 for Defendant to submit their proposed jury charge and proposed verdict form. Plaintiff consents to this request.

For background, Trial is scheduled to begin in this matter on December 16, 2024. In it's pre-trial order, the Court ordered that the Defendant, by July 22, 2024, submit: (1) a pre-trial statement; (2) voir dire questions for prospective jurors; (3) a proposed jury charge; and (4) a proposed verdict form. See ECF No. 120. On July 18, 2024, the Court granted Defendant an extension of time until August 5, 2024 to submit all four documents. See ECF No. 127.

Defendant now requests a brief, two week, extension, for only the proposed jury charge and verdict form¹. As previously mentioned, the undersigned has a voluminous caseload in both federal and state court. In the past two weeks, I have deposed a party in another matter, prepared for, and defended, a 30(b)(6) deposition, drafted and filed a 12(b)(6) motion, and completed other miscellaneous case related tasks. This requested extension will both allow the undersigned enough time to draft those remaining documents and allow his supervisor to review and edit said documents.

Respectfully submitted,

¹ Defendant expects to timely file their proposed pretrial statement and *voir dire* questions on August 5, 2024.

/s/

René L. Macioce
Assistant Corporation Counsel

CC: EMAIL and MAIL

Mary L. Harris
Plaintiff Pro Se
1005 Jerome Avenue, Apt D53
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The request is granted. Defendant shall submit its proposed jury charge and verdict form by August 19, 2024.
The Clerk of Court is respectfully directed to close Docket Number 129.

SO ORDERED.
Date: August 5, 2024
New York, New York



JOHN P. CRONAN
United States District Judge